

1 HONORABLE JAMES L. ROBART
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UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

9 NATIONAL PRODUCTS INC.,

10 Plaintiff,

11 v.

12 ARKON RESOURCES, INC.,

13 Defendant.

15 NATIONAL PRODUCTS INC.,

16 Plaintiff,

17 v.

18 HIGH GEAR SPECIALTIES INC.,

19 Defendant.

20 NATIONAL PRODUCTS INC.,

21 Plaintiff,

22 v.

23 WIRELESS ACCESSORY SOLUTIONS,
24 LLC, d/b/a iBOLT – WIRELESS
ACCESSORY SOLUTIONS, LLC,

25 Defendant.

CONSOLIDATED CASE

Lead Case No. 2:15-cv-01984-JLR

**STIPULATED MOTION AND [PROPOSED]
ORDER FOR REVISED SCHEDULE**

NOTE ON MOTION CALENDAR:

Friday, March 3, 2017

Case No. 2:15-cv-01985-JLR

JURY TRIAL DEMANDED

Case No. 2:15-cv-02024-JLR

JURY TRIAL DEMANDED

1 NATIONAL PRODUCTS INC., Case No. 2:16-cv-00109-JLR
2 Plaintiff,
3 v.
4 BRACKETRON, INC. JURY TRIAL DEMANDED
5 Defendant.
6

7 Pursuant to the Court's February 23, 2017 Minute Entry (Dkt. No. 71) and Order Setting
8 *Markman* Hearing (Dkt. No. 72), plaintiff National Products Inc. ("NPI") and defendants Arkon
9 Resources, Inc. ("Arkon"), High Gear Specialties Inc. ("High Gear"), Wireless Accessory
10 Solutions, LLC, d/b/a IBOLT – Wireless Accessory Solutions, LLC ("IBOLT"), and Bracketron,
11 Inc. ("Bracketron") (collectively, "Defendants") jointly submit the following revised proposed
12 schedule to govern the above-captioned matters.

13 The parties ask that the Court enter the following schedule of deadlines:

Event	Parties' Proposal
Joint Claim Construction and Prehearing Statement (LPR 132)	July 10, 2017
Parties File Simultaneous Opening <i>Markman</i> Briefs (LPR 134)	July 20, 2017
Parties File Simultaneous Responsive <i>Markman</i> Briefs (LPR 134)	August 10, 2017
Tutorial (if necessary)	To be set by the Court
<i>Markman</i> Hearing (LPR 135)	September 19, 2017 at 9:00 a.m.
Reports from Expert Witnesses Under FRCP 26(a)(2)	December 1, 2017
Rebuttal Expert Reports Due	December 22, 2017
All motions related to discovery must be noted on the motion calendar pursuant to LCR 7(d)(3) or LCR 37(a)(2)	26 January 27, 2018

28 STIP. MTN. FOR REVISED SCHEDULE
Case Nos. 2:15-cv-01984-JLR,
2:15-cv-01985-JLR, 2:15-cv-02024-JLR,
2:16-cv-00109-JLR

- 2 -

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Event	Parties' Proposal
Discovery Completed By	February 1, 2018

In addition to the proposed deadlines set forth above, the parties agree that if any discovery requests were pending when the Court granted Defendants' requested stay (Dkt. No. 66), the deadline for responding to those requests is hereby extended fourteen (14) days from the date of entry of this order.

1 Dated: March 3, 2017

Respectfully submitted,

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14 *Attorneys for Plaintiff*
15 *National Products Inc.*

16 Dated: March 3, 2017

Respectfully submitted,

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30 *Arkon Resources, Inc.*

31 *Attorneys for Defendant*
32 *Wireless Accessory Solutions, LLC,*
33 *d/b/a iBolt – Wireless Accessory*
34 *Solutions, LLC*

35 STIP. MTN. FOR REVISED SCHEDULE
36 Case Nos. 2:15-cv-01984-JLR,
37 2:15-cv-01985-JLR, 2:15-cv-02024-JLR,
38 2:16-cv-00109-JLR

1 Dated: March 3, 2017

Respectfully submitted,

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12 *Attorneys for Defendant*
13 *High Gear Specialties Inc.*

14 Dated: March 3, 2017

Respectfully submitted,

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24 *Attorneys for Defendant*
25 *Bracketron, Inc.*

ORDER

2 This matter is before the Court on the parties' Stipulated Motion for Revised Schedule
3 ("the Stipulated Motion"). The Court, having considered this matter and the record in this case,
4 ORDERS as follows:

The Stipulated Motion is GRANTED in its entirety.

IT IS HEREBY ORDERED THAT the following schedule of deadlines is in effect:

Event	Deadline
Joint Claim Construction and Prehearing Statement (LPR 132)	July 10, 2017
Parties File Simultaneous Opening <i>Markman</i> Briefs (LPR 134)	July 20, 2017
Parties File Simultaneous Responsive <i>Markman</i> Briefs (LPR 134)	August 10, 2017
Tutorial (if necessary)	To be set by the Court
<i>Markman</i> Hearing (LPR 135)	September 19, 2017 at 9:00 a.m.
Reports from Expert Witnesses Under FRCP 26(a)(2)	December 1, 2017
Rebuttal Expert Reports Due	December 22, 2017
All motions related to discovery must be noted on the motion calendar pursuant to LCR 7(d)(3) or LCR 37(a)(2)	January 26, 2018
Discovery Completed By	February 1, 2018

SO ORDERED this 6 day of March, 2017.

HONORABLE JAMES L. ROBART
UNITED STATES DISTRICT JUDGE

1 Presented by:

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15 *National Products Inc.*

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30 *Arkon Resources, Inc.*

31 *Attorneys for Defendant*
32 *Wireless Accessory Solutions, LLC,*
33 *d/b/a iBolt – Wireless Accessory Solutions, LLC*

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20 *High Gear Specialties Inc.*

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34 STIP. MTN. FOR REVISED SCHEDULE
35 Case Nos. 2:15-cv-01984-JLR,
2:15-cv-01985-JLR, 2:15-cv-02024-JLR,
2:16-cv-00109-JLR

1 CERTIFICATE OF SERVICE

2 I, Sharie L. Parks, hereby certify that on March 3, 2017, I caused the foregoing

3 **STIPULATED MOTION AND [PROPOSED] ORDER FOR REVISED SCHEDULE** to be
4 served on the following parties as indicated below:

<p>5</p> <p>6 Jayson W. Sowers (WSBA No. 27618) 7 James E. Breitenbacher (WSBA No. 27670) 8 RIDDELL WILLIAMS P.S. 9 1001 Fourth Avenue, Suite 4500 11 Seattle, WA 98154-1192</p> <p>10 <i>Attorneys for Defendants Arkon Resources, Inc.; Attorneys For Defendant Wireless Accessory Solutions, LLC, d/b/a iBolt – Wireless Accessory Solutions, LLC</i></p>	<p>12 [] By United States Mail 13 [] By Legal Messenger 14 [X] By Electronic CM/ECF 15 [] By Overnight Express Mail 16 [] By Facsimile 17 [] By Email 18 jsowers@riddellwilliams.com 19 jbreitenbacher@riddellwilliams.com</p>
<p>12 Marc A. Karish (admitted <i>pro hac vice</i>) 13 KARISH & BJORGUM, PC 14 119 E. Union Street, Suite B 15 Pasadena, CA 91103</p> <p>16 <i>Attorneys for Defendant Arkon Resources, Inc.; Attorneys For Defendant Wireless Accessory Solutions, LLC, d/b/a iBolt – Wireless Accessory Solutions, LLC</i></p>	<p>17 [] By United States Mail 18 [] By Legal Messenger 19 [X] By Electronic CM/ECF 20 [] By Overnight Express Mail 21 [] By Facsimile 22 [] By Email 23 marc.karish@kb-ip.com</p>
<p>18 Rodney L. Umberger (WSBA No. 24948) 19 Daniel J. Velloth (WSBA No. 44379) 20 WILLIAMS, KASTNER & GIBBS PLLC 21 601 Union Street, Ste. 4100 22 Seattle, WA 98101-2380</p> <p>23 <i>Attorneys for Defendant High Gear Specialties Inc.</i></p>	<p>24 [] By United States Mail 25 [] By Legal Messenger 26 [X] By Electronic CM/ECF 27 [] By Overnight Express Mail 28 [] By Facsimile [] By Email [by agreement of counsel] rumberger@williamskastner.com dvelloth@williamskastner.com</p>
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7	<p>Terrance C. Newby (admitted <i>pro hac vice</i>) E. Casey Beckett (admitted <i>pro hac vice</i>) Kristian C.S. Weir (admitted <i>pro hac vice</i>) MASLON LLP Wells Fargo Center 90 South Seventh St., Ste. 3300 Minneapolis, MN 55402</p> <p><i>Attorneys for Defendant Bracketron, Inc.</i></p>	<p>[] By United States Mail [] By Legal Messenger [X] By Electronic CM/ECF [] By Overnight Express Mail [] By Facsimile [] By Email [by agreement of counsel] terry.newby@maslon.com casey.beckett@maslon.com kristian.weir@maslon.com</p>
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13 Dated: March 3, 2017 By: s/Sharie L. Parks
14 For Jonathan T. McMichael, WSBA No. 49895
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